

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
**AULISTAR MARK, HANCHEN LU and** :  
**ANDREW HUDSON, Individually and on Behalf of** :  
**All Others Similarly Situated,** :  
:  
**Plaintiffs,** : Civil Action No. 1:13-cv-04347-AJN  
**-against-** :  
:  
**GAWKER MEDIA LLC, and NICK DENTON,** :  
:  
**Defendants.** :  
----- X

AFFIDAVIT OF RICHARD BLAKELEY

RICHARD BLAKELEY declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts sets forth in this Declaration.

2. I started working at Gawker Media, LLC (“Gawker”) in 2006 as a freelance video editor and became the full-time head of the video department that same year. I then worked at Gawker.TV (“GTV”) as Editor-In-Chief from 2009 to 2011, where I supervised David Matthews when he was an intern. I currently work at the publication *The Week* as the Director, Digital Products and Strategy.

3. I directly managed GTV interns.

4. I created a detailed training program to teach interns valuable skills in the publishing industry. We held weekly or daily meetings to discuss newsworthy items that could potentially become posts on the site. Interns learned how an online publisher works, where the money for publishing comes from, and other parts of the publishing industry. These are important concepts that are the building blocks and basic principles

of how a publication works that the interns would not learn in a classroom setting. This knowledge was transferable to other online publications in the industry. We did not train full-time employees in the ins and outs of the publishing industry, and we spent significantly less time editing their work. Also, unlike GTV interns, full-time employees were permitted to publish their own work and did not always require editor approval to do so.

5. The interns watched television in order to learn how to pitch ideas that they thought were newsworthy for the site. The GTV interns learned how to write on the editorial site, and if we published their post, they would receive a byline. The interns also put and replaced tags on past posts. Tags are labels that allow users to search certain topics by tag to find relevant posts.

6. We did not have paid interns at either Gawker.com or GTV.

7. It was made clear that the interns were not entitled to a job at the conclusion of their internships. At the beginning of the internship they signed a contract, which said they understood that they were not guaranteed employment and that they were not going to be paid. A true and correct copy of the contract form is attached hereto. Many of the interns received college credit, or at least represented that they were getting credit.

8. I think the internship was a huge benefit to the interns. Many former interns were eventually hired in some capacity at Gawker. They all had learned valuable skills during their internships to use in their careers going forward. Specifically, the interns learned how to work at the very fast pace required by digital publishing, how to identify interesting stories, and how to write compelling, concise posts.

9. The interns did not replace existing staff. They mostly watched television and received training on how to watch it carefully to spot interesting stories. Our operations were actually impeded by having to train them, as anything the interns wanted to write and publish on the site had to be vetted and edited by a supervisor, and any video they edited was recut by an editor. This was extra work that our staff normally would not have to do.

10. I supervised David Matthews when he was a GTV intern. I can say unequivocally that he was lazy and would refuse or fail to take directions. I specifically told A.J. Daulario, Editor-in-Chief of Deadspin at the time, not to bring him on when he sought an internship at Deadspin because David simply was not very good. I have never said that about anyone before, but David failed to do the simple tasks he was asked to do.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 10th day of January, 2014 in New York, NY.



RICHARD BLAKELEY